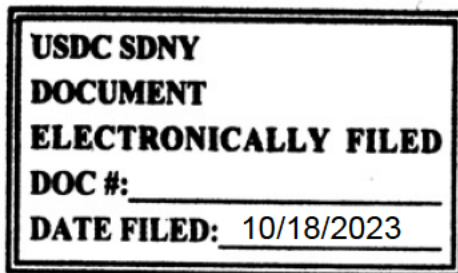


C A D W A L A D E R

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VIA ECF

The Honorable Jessica G. L. Clarke  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

October 6, 2023

Sealing request granted in part and denied in part. Exhibits that are documents from the Cayman Proceedings that have not been publicly disclosed in the Cayman Proceedings shall remain under seal. Documents that have been publicly disclosed in the Cayman Proceedings shall not remain under seal.

SO ORDERED:

10/18/2023

HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

**Re: *In re Application of GHF General Partner Limited and The GHF Group Limited for an Ex Parte Order to Conduct Discovery for Use in Foreign Proceedings Pursuant to 28 U.S.C. § 1782, No. 23-MC-335(JGLC)***

Dear Judge Clark:

We submit this letter-motion to seal on behalf of Respondent Badr Abdelhameed Dhia Jafar (“**Respondent**”) in the above-referenced proceeding. Pursuant to paragraphs 5(d) and 5(e) of the Court’s Individual Rules, we respectfully request leave to (i) publicly file a redacted version of the Memorandum of Law in Support of Respondent Badr Abdelhameed Dhia Jafar’s Motion to Quash *Ex Parte* Subpoenas Pursuant to 28 U.S.C. § 1782 (the “**Memorandum of Law**”); and (ii) file an unredacted version of the Memorandum of Law under seal.

The Application in this case and the exhibits thereto were filed, and currently remain, under seal. In an Order dated September 26, 2023, the Court ordered that any motions seeking to seek to maintain those documents under seal be filed by October 3, 2023. ECF No. 7.

On October 3, 2023, Applicants GHF General Partner Limited and The GHF Group Limited (together, “**Applicants**”) submitted a letter-motion seeking to maintain certain exhibits to the Application under seal, on the ground that those exhibits are non-public documents from a pending litigation in the Cayman Islands (the “**Cayman Litigation**”) in which Applicants are defendants. ECF No. 16. In that letter-motion, Applicants ask the Court to maintain Exhibits D, E, and F to the Application under seal. *Id.* at 2. Additionally, counsel for the plaintiff in the Cayman Litigation has taken the position that Exhibits A, B, G, H, J, K, L, and M to the Application should be maintained under seal. *See id.* at 3-4. Respondent, who is not a party to the Cayman Litigation, takes no position on the issue. *See id.* at 2. Applicants’ letter-motion remains pending.

**C A D W A L A D E R**

Respondent's Memorandum of Law discusses or otherwise cites documents that are the subject of Applicants' pending letter-motion to seal, including Exhibits G and K to the Application. Accordingly, we respectfully request leave to (i) publicly file a redacted version of the Memorandum of Law; and (ii) file an unredacted version of the Memorandum of Law under seal.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Nicholas A. Gravante, Jr.

Nicholas A. Gravante, Jr.

Cc: All counsel of record (by ECF)